

1 J. Jonathan Hawk (SBN 254350)
jhawk@mwe.com
2 **McDERMOTT WILL & EMERY LLP**
2049 Century Park East, Suite 3200
3 Los Angeles, CA 90067-3206
Telephone: 1 310 277 4110
4 Facsimile: 1 310 277 4730

5 Attorneys for Respondent X CORP.

6 Robert S. Green (SBN 136183)
gnecf@classcounsel.com
7 **GREEN & NOBLIN P.C.**
2200 Larkspur Landing Circle, Suite 101
8 Larkspur, CA 94939
Telephone: 1 415 477 6700
9 Facsimile: 1 415 477 6710

10 Ralph M. Stone (admitted *pro hac vice*)
rs@stonepllc.com
11 **STONE LAW GROUP PLLC**
620 Fifth Avenue, 2nd Floor
12 New York, NY 10020
Telephone: 1 212 239 1550
13

14 Attorneys for Applicants

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA**

17 In re *ex parte* Application of HateAid gGmbH,
Josephine Ballon and Avital Grinberg,

18 Petitioners,

19 To Take Discovery Pursuant to 28 U.S.C. § 1782
20 in Aid of Foreign Litigants or Proceedings.
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CASE NO. 4:23-mc-80235-HSG

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR X CORP.
TO RESPOND TO APPLICATION TO
AND INCLUDING NOVEMBER 27, 2023**

Pursuant to Civil Local Rules 6-2 and 7-12, Respondent X Corp., on the one hand, and Petitioners HateAid gGmbH, Josephine Ballon, and Avital Grinberg (collectively, “Applicants”), on the other, by and through their respective counsel, submit this stipulation and [proposed] order.

WHEREAS, on September 19, 2023, Applicants filed with this Court an *Ex Parte* Application To Take Discovery Pursuant to 28 U.S.C. § 1782 in Aid of Foreign Litigants or Proceedings (the “Application”) (ECF 1);

WHEREAS, the Application states that Applicants are plaintiffs in civil court proceedings in Berlin, Germany, where the defendant is Twitter International Unlimited Company (“TIUC”), a foreign subsidiary of X Corp. X Corp. is not a party to that litigation.

WHEREAS, the Application seeks an order from this Court that would authorize Applicants to serve a subpoena on X Corp., seeking nine categories of documents and a deposition (ECF 1-2, 1-3);

WHEREAS, on October 25, 2023, the Court issued an order requiring Applicants to serve X Corp. with the Application no later than October 30, 2023, and providing X Corp. until and including November 13, 2023, to file a response to the Application;

WHEREAS, Applicants served the Application on X Corp. on October 27, 2023;

WHEREAS, X Corp. has recently retained its undersigned counsel to represent it in connection with the Application. Undersigned counsel for X Corp. requires time to analyze the matters raised in the Application, including the relevant issues in the foreign proceeding pending in Berlin, Germany;

WHEREAS, to prepare its response, X Corp. has requested and Applicants have agreed, subject to this Court’s approval, to extend X Corp.’s deadline to respond to the Application by fourteen (14) days, from November 13, 2023, to and including November 27, 2023;

IT IS HEREBY STIPULATED by and between the Parties hereto, through their undersigned counsel, and subject to the approval of the Court, that X Corp.’s deadline to respond to the Application shall be extended by fourteen (14) days, from November 13, 2023, to and including November 27, 2023.

IT IS SO STIPULATED.

1 Dated: November 10, 2023

McDERMOTT WILL & EMERY LLP

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3 By: /s/ J. Jonathan Hawk
4 J. JONATHAN HAWK
5 Attorneys for Respondent X CORP.
6

7 Dated: November 10, 2023

GREEN & NOBLIN, P.C.
STONE LAW GROUP PLLC

8
9 By: /s/ Ralph M. Stone
10 ROBERT S. GREEN
11 RALPH M. STONE
12 Attorneys for Applicants HATEAID GGMBH,
13 JOSEPHINE BALLON AND AVITAL
14 GRINBERG
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I Jonathan Hawk, am the ECF User whose identification and password are being used to file this document. Pursuant to Civil Local Rule 5-1(i)(3), I attest under penalty of perjury that all signatories have concurred in this filing.


Date: November 10, 2023
Los Angeles, California

/s/ Jonathan Hawk
Jonathan Hawk

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 13, 2023


HONORABLE HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE

McDERMOTT WILL & EMERY LLP
ATTORNEYS AT LAW
LOS ANGELES